

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

2007 MAR 13 A 9:13

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

ROBIN JAFFE,  
Plaintiff,

\*

v.

\*

CASE NO.

3:07CV161- mef

VINCENT OLIVIERI,  
Defendant.

\*

**MOTION TO SUPPLEMENT THE COMPLAINT**

COMES NOW, The Plaintiff, Robin Jaffe, moves this Honorable Court, to grant him leave to supplement the complaint in the above styled cause in accord with Rule 15 (d) Federal Rules of Civil Procedure as grounds therefore respectfully shows unto this Honorable Court the following:

1. The Plaintiff, Robin Jaffe, is a citizen of Alabama.
2. The Defendant, Vincent Olivieri is a citizen of Connecticut.
3. The Plaintiff filed a lawsuit against the Defendant in the Circuit Court of Lee County, Alabama, styled as Robin Jaffe v. Vincent Olivieri, CV-06-664.
4. The original complaint inadvertently omitted an amount of damages.
5. The total of all damages from the above styled suit, inclusive of cost, interest, punitive, and all other damages, do not exceed \$74,000 (Seventy-four thousand dollars).

WHEREFORE, the Plaintiff, Robin Jaffe prays upon this Honorable Court to grant the Plaintiff's motion to supplement his complaint and for any such further relief the cause of justice may requires.

Respectfully submitted this the 12<sup>th</sup> day of March, 2007,

WHITTELSEY, WHITTELSEY & POOLE, P.C.

A handwritten signature in black ink, appearing to read 'W. David Dawson', is written over a horizontal line.

W. David Dawson  
Attorney for the Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon the attorneys for the defendants, Phillip E. Adams, Esq. and Michael E. Short by hand delivering a copy or by placing it in the United State mail, postage prepaid, to the correct address of Adams, Umbach, Davidson, & White, LLP, Post Office Box 2069 Opelika, Alabama 36803-2069 on this the 12<sup>th</sup> day of March, 2007.

  
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W. DAVID DAWSON

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

ROBIN JAFFE,  
Plaintiff,

\*  
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v.

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CASE NO. 3:07cv161-mef

VINCENT OLIVIERI,  
Defendant.

\*  
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**SUPPLEMENTAL COMPLAINT**

**COUNT I**

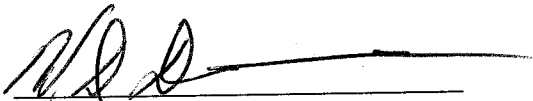
**(LIBEL)**

1. The Plaintiff, Robin Jaffe, is a citizen of Alabama.
2. The Defendant, Vincent Olivieri is a citizen of Connecticut.
3. The Plaintiff is employed in the theater department at Auburn University as an associate professor.
4. On or about October 22<sup>nd</sup>, 2005, the Defendant intentionally distributed a letter libelous in nature concerning Robin Jaffe within and around Auburn University located in Lee County Alabama.
5. As a proximate result of said intentional, willful, wanton and libel acts and conduct of said Defendant, the Plaintiff suffered and sustained injuries and damages not exceeding \$74,000 (seventy-four thousand dollars) inclusive of any and all compensatory damages, cost, interest, punitive damages and any and all other damages.

**JURY DEMAND**

The Plaintiff demands Trial by struck jury on all counts.

Whittelsey, Whittelsey, & Poole, P.C.

A handwritten signature in black ink, appearing to read 'W. David Dawson', is written over a horizontal line.

W. David Dawson  
Attorney for the Plaintiff  
600 Avenue A  
Opelika, AL 36801

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W. DAVID DAWSON